

**Internal EPA Document - Do Not Cite or Quote**

**Issues raised by Honda in 11/10/2009 email.**

**We have several, minor issues that we would like to ask in advance of our meeting, that we do not plan to discuss, unless time permits:**

Honda Item (a) A/C Idle Test: There is no description of fan speed for manual AC systems in the idle test description. Honda assumes the condition of the fan speed should be set to "Max." Is this correct? Will you clarify in the regulation?

**EPA Draft Response:**

Honda Item (b) VMT application to LDT1: For early credits (MY09-MY11), VMT for PC is applied to PC and LDT1, and for the regular credits (MY12+) VMT for PC is applied to PC only. Is this your intent?

**EPA Draft Response:**

Honda Item (c) Dual Fuel Vehicles: Is EPA considering PHEVs as "dual fuel vehicles." Dual fuel vehicles have a phased-out credit (by 2020). If PHEVs are not considered "Dual Fuel" vehicles, then how do you plan to treat them?

**EPA Draft Response:**

Honda Item (d) A/C Credits: There seems to be an inconsistency between two references:

In 40CFR1866-12(c)(1): A/C credits are conditioned on an improvement of 10% "when compared to previous design"  
In 40CFR1866-12(c)(6): A/C credits are conditioned on 10% improvement "when compared to a system using standard, or prior model year" designs. Which is correct? Honda thinks it should be based on "previous or standard design" not "prior model year" design.

**EPA Draft Response:**

Honda Item (e) PHEV EAER: ARB uses RcdA during FTP. EPA does not have a specific description of EAER. Honda proposes that EPA use ARB's definition.

**EPA Draft Response:**